

## **REMARKS**

Claims 1-56 were pending and presented for examination and in this application. In an Office Action dated August 24, 2007, claims 1-56 were rejected. Applicant thanks the Examiner for examination of the claims pending in this application and addresses the Examiner's comments below.

Applicant is amending claims 1, 5, 17, 21, 33, 36, 41, 42 and 54 in this Amendment and Response.

In view of the Amendment herein and the Remarks that follow, Applicant respectfully requests that the Examiner reconsider all outstanding objections and rejections and withdraw them.

### **Response to Rejection Under 35 USC 103(a) in View of Gourraud and Arteaga**

In the Office Action, the Examiner rejects claims 1-56 under 35 USC §103(a) as allegedly being unpatentable over U.S. Patent Publication No. 2002/0026473 ("Gourraud") in view of U.S. Patent Publication No. 2002/0161826 ("Arteaga"). This rejection is now overcome in light of the amended claims.

Claim 1, as amended, recites a traffic manager for facilitating communication in accordance with at least one policy between a server node associated with a first interface and a client node in a distributed computing environment. To communicate with both the client node and the server node, the traffic manager comprises a central processing unit operable to "generate and publish at least a second interface, for communication with the first interface, in accordance with said at least one policy, the at least one policy mapping the first interface to the second interface." This beneficially allows the traffic manager to generate a

second interface to interact with the first interface, allowing interaction between the client node and server node associated with different interfaces. The at least one policy maps the first interface to the second interface to bridge disparate characteristics between the client node and server node. (See, for example, FIG. 2, specification ¶ [0024], [0026]) The first interface, second interface and at least one policy allow the traffic manager to bridge one or more disparate characteristics, such as security features, between the client node and server node by generating a second interface which communicates with the first interface.

Gourraud does not disclose or suggest a traffic manager which is operable to “generate and publish at least a second interface, for communication with the first interface, in accordance with said at least one policy, the at least one policy mapping the first interface to the second interface.” Gourraud discloses an application programming interface (API) based telecommunication system including a call server, a service manager, an application and an API. (Gourraud, FIGS. 3, 4) The call server obtains criteria corresponding to a trigger from a user profile database and sends the trigger when the criteria occur. The service manager receives the trigger and determines how to execute an application responsive to the trigger. The API provides a shared interface which allows the call server, service manager and application to communicate with each other. The service manager uses the API to transmit a communication to execute the application. (Gourraud, FIGS. 3, 4; ¶ [0040]-[0043]) Gourraud merely discovers services and application programming interfaces “supported by the network,” so Gourraud assumes the existence of a set of APIs that allow communication between the call server, the service manager and the application. (Gourraud, ¶ [0055]) Hence, Gourraud merely uses preexisting and preconfigured APIs to communicate between various components and does not “generate and publish at least a second interface,

for communication with the first interface, in accordance with said at least one policy, the at least one policy mapping the first interface to the second interface.”

As Gourraud merely uses an existing API for communication between components, there is no disclosure of generating and publishing “generate and publish at least a second interface, for communication with the first interface, in accordance with said at least one policy, the at least one policy mapping the first interface to the second interface.” Rather, Gourraud discloses that “the same APIs are used between the application 302 and the service manager 312 as between the application 302 and the network entities,” contradicts the claimed feature of “at least one policy mapping the first interface to the second interface” which specifies generation and publishing of a second interface for communication with the first interface. (Gourraud, ¶ [0064]) As Gourraud uses the same predetermined API between the application, service manager and network entities, there is no mapping of a first interface to a second interface or generation of a second interface to communicate with the first interface, as claimed.

Arteaga does not remedy the deficient disclosure of Gourraud. Arteaga merely discloses techniques for conducting online and offline transactions on different remote communication devices, such as handheld computers, PDAs or palmtops by integrating “a resident web server and resident browser on the remote communication device.” (Arteaga, ¶ [0007]). As noted by the Examiner, Arteaga discloses creating “a SOAP envelope” which is “sent as a request to remote server” and used to access the remote client application. (Arteaga, ¶ [0116]) Thus, Arteaga merely transmits the SOAP envelope using HTTP to exchange data between a remote communication device and an enterprise server. (Arteaga, ¶ [0009]) Thus, Arteaga merely integrates a web browser and web server into a remote

communication device to allow direct communication both within the device and between the device and an enterprise web server. As disclosed in Arteaga, communication is enabled using predefined protocols, such as a combination of HTTP and SOAP protocols. Rather than “generate and publish at least a second interface, for communication with the first interface, in accordance with said at least one policy, the at least one policy mapping the first interface to the second interface.” Arteaga uses a single communication interface, the SOAP envelope, which is transmitted using a standardized communication channel such as HTTP, to establish a standardized method of communication between different components. Arteaga does not generate “at least a second interface...in accordance with said at least one policy, the at least one policy mapping the first interface to the second interface,” as claimed, but rather uses a predefined, conventional protocol to communicate between components.

By using conventional protocols or combinations of conventional protocols, Arteaga does not disclose “at least one policy mapping the first interface to the second interface” which is used to “generate and publish at least a second interface, for communication with the first interface,” as claimed, but merely uses a data transfer protocol to transfer data between different components. For example, Arteaga discloses that “the client device 20 can establish a local or network connection with a web server through a data transfer protocol” and that “a SOAP envelope is preferably securely communicated from the client device 20 to the network web server 700 via HTTPS.” (Arteaga, ¶ [0056], [0157]) This merely specifies that a type of data transfer protocol, such as HTTPS, is used to transmit data, such as the SOAP envelope, between a client device and a web server. There is no policy which maps the first interface to the second interface, but merely a data transfer protocol and data which is communicated by the data transfer protocol. Thus, Arteaga merely recites using a

predefined data transfer protocol to communicate the data rather than generating and publishing at least a second interface according to a policy which maps the first interface to the second interface.

Arteaga uses multi-platform data transfer and processing capabilities because data communications may be utilized by a wide variety of applications and systems. To provide this multi-platform data transfer, Arteaga uses standard protocols for data transmission, such as a “SOAP envelope” and “HTTP,” so that both the remote communication device and a networked device use the same format to receive and transmit data. (Arteaga, ¶ [0009]) However, this merely specifies a standard protocol for both communicating devices. Rather than generate a second interface for communication with the first interface “in accordance with said at least one policy, the at least one policy mapping the first interface to the second interface,” as claimed, Arteaga merely provides examples of conventional data transmission protocols used by devices. Hence, Arteaga merely uses a standard and conventionally defined protocol, such as HTTP, to transmit the SOAP envelope rather than use at least one policy to map a first interface to a second interface and “generate and publish at least a second interface for communication with the first interface,” as claimed.

Based on the above amendment and the remarks, Applicant respectfully submits that for at least these reasons claim 1 is patentably distinguishable over the cited reference. Therefore, Applicant respectfully requests that the Examiner reconsider the rejection, and withdraw it.

As amended, independent claims 17, 33, 41, 42 and 54 include limitations similar to claim 1. Thus, all arguments advanced above with respect to claim 1 also apply to claims 17,

33, 41, 42 and 54. Hence, claims 17, 33, 41, 42 and 54 are patentably distinguishable over Gourraud and Arteaga, both alone and in combination.

As claims 2-16 depend from claim 1, all arguments advanced above with respect to claim 1 are hereby incorporated so as to apply to claims 2-16. Therefore, Applicant respectfully submits that claims 2-16 are patentable over the cited references, both alone and in combination, and respectfully requests withdrawal of their rejection.

As claims 18-32 depend from claim 17, all arguments advanced above with respect to claim 17 are hereby incorporated so as to apply to claims 18-32. Therefore, Applicant respectfully submits that claims 18-32 are patentable over the cited references, both alone and in combination, and respectfully requests withdrawal of their rejection.

As claims 34-40 depend from claim 33, all arguments advanced above with respect to claim 1 are hereby incorporated so as to apply to claims 34-40. Therefore, Applicant respectfully submits that claims 34-40 are patentable over the cited references, both alone and in combination, and respectfully requests withdrawal of their rejection.

As claims 43-53 depend from claim 42, all arguments advanced above with respect to claim 1 are hereby incorporated so as to apply to claims 43-53. Therefore, Applicant respectfully submits that claims 43-53 are patentable over the cited references, both alone and in combination, and respectfully requests withdrawal of their rejection.

As claims 55 and 56 depend from claim 54, all arguments advanced above with respect for claim 1 are hereby incorporated so as to apply to claims 55 and 56. Therefore, Applicant respectfully submits that claims 55 and 56 are patentable over the cited references, both alone and in combination, and respectfully requests withdrawal of their rejection.

### Conclusion

In sum, Applicant respectfully submits that claims 1-56, as presented herein, are patentably distinguishable over the cited references. Therefore, Applicant requests reconsideration of the basis for the rejections to these claims and request allowance of them.

In addition, Applicant respectfully invites the Examiner to contact Applicant's representative at the number provided below if the Examiner believes it will help expedite furtherance of this application.

Respectfully Submitted,

KERRY CHAMPION

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By: /Brian G. Brannon/

Brian G. Brannon, Attorney of Record  
Registration No. 57,219  
FENWICK & WEST LLP  
801 California Street  
Mountain View, CA 94041  
Phone: (650) 335-7610  
Fax: (650) 938-5200